

Jorge Alejandro Rojas
Rojas.jorge96@gmail.com
Plaintiff in Pro Se
557 Cambridge Way
Bolingbrook, IL 60440
(424) 219-1582

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JORGE ALEJANDRO ROJAS,

Plaintiff,

v.

UNPLUGGED MEDIA, LLC, and
ALEXANDER BYKHOVSKY,

Defendants.

Case No. 2:23-cv-02667-SPG-KS

District Judge Sherilyn Peace Garnett
Magistrate Judge Karen L. Stevenson

**REQUEST FOR CLERKS ENTRY OF
DEFAULT AS TO ALEXANDER
BYKHOVSKY**

Plaintiff, Jorge Alejandro Rojas, pursuant to Fed. R. Civ. P. 55(a), requests the Clerk make an Entry of Default against Defendant Alexander Bykhovsky (“Bykhovsky”).

Defendant Bykhovsky was served (Dkt. 37) with the Amended Complaint (Dkt. 12) on January 24, 2024 by a process server to his e-mail, alexgoldlv@gmail.com, pursuant to this Court’s order granting alternative service via e-mail, Dkt. 36 (“Accordingly, the Court grants Plaintiff’s motion for alternative service, insofar as it requests to serve Bykhovsky by email”). Plaintiff notes that the read receipt included in the e-mail transmission has identified Bykhovsky reading the e-mail at least once. Dkt. 37 p. 3.

More than twenty one (21) days following service have elapsed. Bykhovsky is not an infant, in the military, or incompetent. Bykhovsky has failed to plead or otherwise

1 defend this action. On February 14, 2024, Plaintiff received an email from Bykhovsky with
 2 a subject line of “My response within 21 days-“ and a body of “This is being filed with the
 3 court today and also emailing you so you have it,” with an attachment which included a
 4 word document of an unsigned Fed. R. Civ. P. 12(b)(2) motion¹. The motion also included
 5 a reference to an Exhibit which was not included in the e-mail Bykhovsky sent.

6 To date, Plaintiff has not been served with a copy of any responsive pleading.
 7 Plaintiff contacted the Clerk on February 21, 2024, asking if they have processed
 8 documents received on paper February 14, 2024, and the Clerk stated in sum and substance
 9 that any documents received then should have been entered into CM/ECF by now.

10 Plaintiff has reviewed the Court’s docket and as of this filing has not seen a
 11 responsive pleading. Having met all the factors to make an entry of default, Plaintiff
 12 requests the Clerk make an Entry of Default as to Defendant Bykhovsky.

13 Plaintiff intends to seek entry of default judgment pursuant to Fed. R. Civ. P. 55(b)
 14 as to all Defendants within thirty (30) calendar days of the entry of the clerk’s entry of
 15 default – unless the Court orders a shorter time period.

16 Respectfully submitted,

17 Dated: February 21, 2024.

18 */s/ Jorge Alejandro Rojas*
 19 Jorge Alejandro Rojas
Rojas.jorge96@gmail.com
 20 Plaintiff in Pro Se
 557 Cambridge Way
 21 Bolingbrook, IL 60440
 (424) 219-1582

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28 ¹ Plaintiff notes he was not contacted by Defendant to confer prior to the filing of
 any 12(b)(2) motion, as required by the Court’s standing order, Dkt. 7 ¶¶ G.1(b), H.(1).

CERTIFICATE OF SERVICE

A copy of this filing will be sent to each Defendants last known address and/or registered agent via USPS First Class Mail, and via e-mail to alexgoldlv@gmail.com.

Dated: February 21, 2024.

/s/ Jorge Alejandro Rojas